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May 11, 2022

## VIA ECF

The Honorable Vernon S. Broderick  
United States District Court  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Application granted in part and denied in part. The application for leave to file under seal is granted, and Defendant is directed to provide copies of the documents in question to the Court. The parties are directed to meet and confer to determine what redactions should be made to the exhibits and provide the Court with suggested redactions on or before June 27, 2022.

**SO ORDERED:**



HON. VERNON S. BRODERICK  
UNITED STATES DISTRICT JUDGE

05/26/22

**Re:** *United States v. Lesane*, No. 1:22-cr-00110-VSB

Dear Judge Broderick:

We represent Eric Lesane in the above-captioned matter. Earlier today, we filed a Motion to Suppress and to Inspect the Grand Jury Minutes, an accompanying Memorandum of Law in support of that Motion, the Declaration of Jenna M. Dabbs ("Dabbs Declaration"), and Exhibits attached to that Declaration. (ECFs 19, 20, 21.)

The government has requested that certain Exhibits to the Dabbs Declaration not be filed on the public docket due to concerns regarding confidential law enforcement and supervision methods and other information contained therein. Those are Exhibits A, B, C, D, E, and F. As such, we have not filed those documents at this time. Similar to the procedure outlined in Rule 5(B)(iii)(a) of Your Honor's Individual Rules & Practices in Civil Cases,<sup>1</sup> we are submitting this letter motion seeking leave to file those documents, either under seal or in redacted form, at the request of an opposing party.

We are happy to provide the documents to the Court, in either redacted or unredacted form, at any time, and in whatever manner is deemed most appropriate.

Respectfully submitted,



Jenna M. Dabbs

*Counsel for Eric Lesane*

cc: AUSA Elizabeth Espinosa (via ECF)

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<sup>1</sup> Counsel recognizes that this is a criminal case and is relying on this Rule in the absence of a similar procedure for filing documents either under seal or in redacted form at the request of an opposing party in criminal cases.